

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 25-cr-60128-WPD

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CHAD ANTHONY CLARK,
Defendant.

/

UNOPPOSED JOINT MOTION TO CONTINUE CALENDAR CALL AND TRIAL

The Defendant, CHAD ANTHONY CLARK, moves this Court through undersigned counsel to extend the Calendar Call and Trial dates. In support of this Motion, undersigned counsel states the following:

1. On or about May 12, 2025, Mr. Chad Anthony Clark was arrested in the above-mentioned cause. [D.E. 1].
2. The Calendar Call is set for July 11, 2025, and Jury Trial is set for July 14, 2025. [D.E. 75].
3. The first response to the Standing Discovery Order was received on or about June 17, 2025, and it is voluminous.
4. Mr. Clark is incarcerated at the North Broward Bureau, which presents certain obstacles to reviewing the voluminous discovery and more time is needed to complete discovery review.
5. Thus, undersigned counsel respectfully requests that the Calendar Call and Trial dates be extended by at least sixty (60) days.
6. Undersigned counsel has conferred with counsel for Mr. Clark's co-defendants, and the

following join in on this Motion: Gennaro Cariglio Jr., (on behalf of Knight-Lewis); Jonathan Friedman (on behalf of co-defendant De'Andre Maurice Grier); Humberto Dominguez (on behalf of co-defendant Mark Byron Handspike, Jr.).

7. David Donet Jr. (on behalf of Dennard Oshea Dobard) does not have an objection to this Motion, but has not been included in the Trial Order at Docket Entry 75.
8. Undersigned Counsel would adopt the Motion filed by counsel for Deggory Clark (D.E. 84), as she also has a long-standing professional obligation to attend the Annual CJA Attorney Conference in Bonita Springs, Florida, which takes place during July 10, 2025 - July 11, 2025.
9. Undersigned Counsel would further respectfully request that this case not be set September 5, 2025 – September 15, 2025, as she will be out of the State.
10. Undersigned counsel, as well as counsel for co-defendants, have conferred with AUSAs Joseph Cooley and Corey O’Neal, and they do not oppose the relief sought herein.
11. Mr. Clark, by and through his undersigned Counsel, hereby gives Notice to the Court that he has discussed with counsel his right to a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. §3161. Counsel and Defendant acknowledges and certify that Mr. Smith, hereby waives his rights to a speedy trial to a time beyond the time limits and exclusions set forth in said “Speedy Trial Act” and specifically agrees that the time period between the date of the filing of this Waiver through the end of the trial period to be rescheduled by the Court is to be excluded from the Speedy Trial clock.

WHEREFORE, it is respectfully requested that this Joint Motion be granted, and that the Calendar Call and Trial dates be extended by at least sixty (60) days.

Respectfully submitted,

/s/ Dianne E. Caramès

Dianne E. Caramès

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CERTIFICATE OF SERVICE

I HEREBY certify that on July 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Dianne E. Caramès